

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:20-cr-00054

NEDELTCHO VLADIMIROV

**EIGHTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA  
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND  
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on March 16, 2020, and March 4, 2021, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Eighth Supplemental Response:**

In this case, the United States hereby incorporates by reference its prior discovery responses on March 30, 2020 (ECF 34), May 20, 2020 (ECF 38), August 24, 2020 (ECF 48), March 18, 2021 (ECF 70), April 30, 2021 (ECF 75), May 27, 2021 (ECF 76), June 25, 2021 (ECF 77), July 6, 2021 (ECF 95) and further supplements its responses as follows:

**Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody**

or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]

**Response:** The United States has disclosed the following items:

1. Supplemental report of Nick Niehaus sent by email and received on July 15, 2021.

**Request H:** Disclose to defendant all evidence favorable to defendant, including impeachment evidence, and allow defendant to inspect, copy or photograph such evidence.

**Response:** The United States is unaware of any such evidence other than that which may otherwise be included herein and in its supplemental responses. As a precautionary measure, the United States discloses that Steven Anderson stated to the United States, on July 13, 2021, that he sold items to Defendant approximately 100 times. Anderson previously testified that he sold items to Defendant "at least 50" times. Anderson further stated that, in one of his initial meetings with Defendant, Anderson stated that one of the items was stolen, and Defendant responded by stating that he did not accept stolen items. However, in the same meeting, Anderson replied that the item was not stolen, and then Defendant purchased it.

The United States further discloses that it has offered limited use immunity to Steven Anderson, Cassidi Wentz, and Nicholas Martin. However, as of the time of this disclosure, no witness has accepted the offer. If that changes, the United States

will immediately disclose the immunity agreement to counsel for Defendant and the Court.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

UNITED STATES OF AMERICA

LISA G. JOHNSTON  
Acting United States Attorney

s/Andrew J. Tessman  
ANDREW J. TESSMAN  
Assistant United States Attorney  
WV State Bar No. 13734  
300 Virginia Street, East, Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
E-mail: [andrew.tessman@usdoj.gov](mailto:andrew.tessman@usdoj.gov)

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "EIGHTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY," has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 15th day of **July, 2021** to:

Timothy J. LaFon  
CICCARELLO DELGIUDICE & LAFON  
Suite 100  
1219 Virginia Street East  
Charleston, WV 25301-2912

By: s/ Andrew J. Tessman